

1 MAXINE I. DOBRO
105 West F Street, 3rd Floor
2 San Diego, CA 92101-6036
(619) 232-5044
3 BAR #98962

4 Attorney for Defendant
Eduardo Ramirez
5

6
7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**
(Honorable Janice Sammartino)

9 UNITED STATES OF AMERICA,) Criminal No. 07-2881-JLS
10)
Plaintiff,) **NOTICE OF MOTION FOR**
11) **DISCOVERY, AND FOR**
vs.) **LEAVE TO FILE FURTHER**
12) **MOTIONS.**
13)
Eduardo Ramirez,) **DATE: 16 NOV. 2007**
14) **TIME: 9:30 A.M.**
15)
Defendant.)
16 _____)

17 TO: The Honorable Janice Sammartino and Assistant United States
18 Attorney Peter Mazza:

19 PLEASE TAKE NOTICE that on 16 November 2007, at 1:30 p.m. or as
20 soon thereafter as the matter may be heard, Defendant, Eduardo
21 Ramirez, by and through his counsel, Maxine Dobro, will move the Court
22 for: Discovery and the opportunity to file additional motions in the
future, should they become necessary.

23 This motion is based upon the instant Notice of Motion, the
24 attached Memorandum of Points and Authorities in Support of the
25 Motion, the files and records of the instant case and any other
26 applicable evidence that becomes available before or during the
27

1 hearing of these motions.

2 DATED: 2 November 2007

Respectfully submitted,

3

4

S/Maxine I. Dobro
Maxine I. Dobro,
Eduardo Ramirez

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28